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Attorneys for the Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

“JENNY,” “CARRIE,” “LILY,” “SARAH,”
“HENLEY,” “MAUREEN,” and “JANE
ROE” as next friend for “PIA,”

Plaintiffs,

v.

THOMAS BLAHA,

Defendant.

Case No: 2:23-cv-07051-HG (E.D.N.Y.)

LETTER TO COURT

Jury Trial Demanded

**CORRESPONDENCE REGARDING PLAINTIFF’S EFFORTS TO SERVE
DEFENDANT**

Plaintiffs filed their Complaint against Defendant Thomas Blaha (“Defendant”) on September 21, 2023. Plaintiffs filed a correct Proposed Summons on September 22, 2023, which was later issued by the Court on September 25, 2023. Plaintiffs must serve the defendant by December 20, 2023.

Defendant Blaha is currently incarcerated at FCI Fort Dix located at 5756 Hartford & Pointville Road Joint Base MDL, New Jersey 08640. On September 28, 2023, Plaintiffs’ counsel contacted the Burlington County Sheriff’s Office and requested that they serve the Defendant,

but the Burlington County Sheriff's Office remains unable to complete service until the end of October. Plaintiffs further attempted to serve the Defendant via We Serve NJ LLC, New Jersey Process Server on September 28, 2023, but We Serve NJ LLC was unable to serve the Defendant by this date due to FCI Fort Dix security protocols. At this time, Plaintiffs anticipate that service of the Defendant will occur on or before October 20, 2023. Plaintiffs' Counsel contacted We Serve NJ LLC on October 10, 2023, in follow up, and Plaintiffs' Counsel was assured that an attempt at service will occur by October 20, 2023. Plaintiffs' Counsel will work to ensure service is complete before the deadline of December 20, 2023.

DATED this 13th day of October 2023.

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/s/ Margaret E. Mabie

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